

### **REMARKS**

With the addition of claims 16-18 and cancellation of claims 6, 7, and 12, claims 1-5, 8-11, and 13-18 are now pending in the above-referenced application and are submitted for the Examiner's reconsideration.

In response to the objection to the claims, Applicants have canceled claims 6, 7, and 12. This, this objection has now been obviated.

Claims 1-15 stand rejected under 35 U.S.C. § 102(b) as being anticipated by United States Patent No. 5,481,487 to Jang et al. ("Jang"). Applicants have amended claims 1 and 9 to recite that "the buffer block includes at least one first buffer for storing only data values to which a first mathematical operation performed thereto after being transferred to the computation block is an addition operation by the computation block, and at least one second buffer for storing only data values to which a first mathematical operation performed thereto after being transferred to the computation block is a multiplication operation by the computation block." Support for this amendment is found at least at page 11, line 11, to page 12, line 9, of the specification. According to the Examiner, sub-memories 141 and 142 respectively meet the recited at least one first buffer and at least one second buffer. However, unlike the recited buffers, sub-memory 141 is not limited to storing only those values that, when transferred to DCT/IDCT circuit 110, have an addition operation performed on them, and sub-memory 142 is not limited to storing only those values that, when transferred to DCT/IDCT circuit 110, have a multiplication operation performed on them. Since Jang does not impose any such limitation on the types of values that these sub-memories can store, we can assume that each of these sub-memories can store both data to be subjected to an addition operation and data to be subjected to a multiplication operation. Accordingly, in view of this discussion, withdrawal of the rejection of claims 1 and 9 (and any claim dependent thereon) is respectfully requested.

As for claim 14, Applicants submit that no basis exists for concluding that Jang teaches the step of "determining whether the data value corresponds to one of an addition operation and a multiplication operation" and of storing the data value in an addition buffer or a multiplication buffer depend on such a determination. According to the diagram of Figure 5 of Jang, write address counter 151 is the only element upstream of the sub-memories 141 and 142 that determines how incoming values are to be stored in the sub-memories. Since write address counter 151 does not make the determination recited in claim 14, Jang does not teach this step and on this basis at least claim 14 is patentable over Jang. Accordingly, withdrawal of the rejection of claim 14 (and any claim dependent thereon) is respectfully requested.

Applicants have added new claims 16-18. Claims 16 and 17 are identical, but depend respectively from claims 1 and 9. These claims both recite “a demultiplexer, connected upstream from the buffer block, for determining whether the first mathematical operation to be performed on each of the data values after being transferred to the computation block is one of the addition operation and the multiplication operation.” Support for these new claims is found at least at page 15, lines 11-13, of the specification. Since Jang does not teach such a demultiplexer, Applicants submit that claims 16 and 17 are patentable over Jang.

Applicants have also submitted new claim 18, which recites that “the determining step includes determining whether a first mathematical operation to be performed on the data value after being transferred to the computation block is one of the addition operation and the multiplication operation.” These claim is substantially similar to the amendments made to claims 1 and 9, and for the same reasons submitted on the behalf of claims 1 and 9, claim 18 is patentable over Jang.

Applicants assert that the present invention is new, non-obvious, and useful. Reconsideration and allowance of the claims are requested.

Respectfully submitted,  
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